

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	CRIMINAL NO. 1:22-mj-05280-JDG
	)	
CATHERINE LEAVY	)	

**ASSENTED-TO MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

Ms. Catherine Leavy, the defendant in the above captioned case, respectfully moves this Court to amend her condition of release as set by the Court on September 16, 2022 (D.E. 7). Specifically, Ms. Leavy requests the condition of electronic monitoring be replaced by a condition placing Ms. Leavy in the third-party custody of her father, Mr. Robert Leavy. As grounds, Ms. Leavy has experienced difficulty with the bracelet, including its interference with her work, as she has landscaping and work opportunities in neighboring western Massachusetts towns, such as Hawley, Massachusetts, where there is no reliable cell-service for her bracelet to connect to. As such, she has had to decline paid work opportunities. As an alternative to the monitoring, Ms. Leavy's father, Mr. Robert Leavy, is willing to serve as a third-party custodian for his daughter, Ms. Leavy. Mr. Leavy is retired, lives in the home with his daughter, is in constant communication with her and aware of her whereabouts and activities twenty-four hours a day, and is fully prepared to ensure that she remains in compliance with all of her Court-ordered conditions of release.

United States Probation, by Christopher Roldan, and the United States Attorney's Office, by Assistant United States Attorney Jared Dolan, assent to this request. Furthermore, United State Probation has already spoken with the proposed third-party custodian and found him suitable. Counsel for Ms. Leavy requests that any hearing on this matter be scheduled via Zoom.

Respectfully Submitted,  
Ms. Catherine Leavy  
By her attorney,

Dated: 9/26/2022

/s/ Forest O'Neill-Greenberg  
Forest O'Neill-Greenberg  
Federal Defender Office  
51 Sleeper St., Fifth Floor  
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CERTIFICATE OF SERVICE

I, Forest O'Neill-Greenberg, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 26, 2022.

/s/ Forest O'Neill-Greenberg  
Forest O'Neil-Greenberg